

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

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5th U.S. DIST. COURT
WEST. DIST. OF MO.
KANSAS CITY, MO.

Kandance Wells

Complaint for a Civil Case

Case No. 4:19-cv-00530-FJG

(to be filled in by the Clerk's Office)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Cumulus Media Corporation /
Access One Corporation

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Kandance A. Wells
Street Address 10208 King's Cove Dr. #201
City and County Merriam, Johnson
State and Zip Code Kansas, 66203
Telephone Number 816-656-9239
E-mail Address wellskandy@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Cumulus Media Corporation / Access One Corporation
Job or Title (if known) National Broadcasting Company
Street Address Peach Tree
City and County Atlanta
State and Zip Code Georgia
Telephone Number _____
E-mail Address (if known) _____

Defendant No. 2

Name Access One Corporation
Job or Title (if known) National Broadcasting Company
Street Address _____
City and County _____

State and Zip Code New York

Telephone Number _____

E-mail Address
(if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. (Check all that apply)

☒ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Corporation used a federally regulated broadcasting
company to track, harass, slander, threaten a consumer
in a biased, abusive manner

☒ Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

Federal Communications Commission - Lewis Pickey (former CEO)
Mary Burner

☐ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, (name) _____, is a citizen of the State
of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional
page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) Cumulus Media Corp., is incorporated under the laws of the State of (name) Georgia, and has its principal place of business in the State of (name) Georgia. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) New York.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain):

I have been unable to recover from public
defamation and harassment is ongoing and constant
and my life was threatened as well as my
career ruined

III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you? I was publicly defamed and slandered at a public event organized by and hosted by a national broadcasting company
- What injuries did you suffer? mental anguish, loss of career, loss of housing, loss of peer group, shamed publicly in community, police brutality, threats
- Who was involved in what happened to you? Cumulus Media / Public Relations departments, celebrities, disc jockeys

- How were the defendants involved in what happened to you?
Promoted over the air my public slander and used biased commentary to continue public abuse and slander and defamation
- Where did the events you have described take place? because of national syndication and outlets used such as social media - Nationally
- When did the events you have described take place? 2011 to present

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

(1) Defamation of Character

(2) Slander

(3) Libel

(4) Third-party tracking/stalking/using media informants

(5) Embedding threats, insults in programming

(6) Continued to slander in form of verbal libel in shows ; events ; public performances

(7) Hacked all electronic devices

(8) Used social media to continue slander

(9) Used social/celebrity status to ruin plaintiff's life

(10) Used civic departments to contain/entrap plaintiff

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

I am asking that the U.S. Courts provide punitive relief from the actions of this corporation. I ask the U.S. Courts

to stop this company from using my personal life for

syndicated commentary on a daily basis as well as perceived threats and jokes regarding Plaintiff's personal life and award

plaintiff monetary relief.

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☒

No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒

No ☐

Do you claim punitive monetary damages?

Yes ☒

No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$17,000,000.00 for mental anguish, physical brutality,
widespread defamation of character, unable to work for 5+ years,
threatening imagery used against plaintiff, suffered from homelessness,
followed and harassed in public, tracked online and in daily engagements,
slandered business ventures, constant and ongoing provocation, hacked electronic
devices, tracked across the country / state lines

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/9, 2019.

Signature of Plaintiff

Printed Name of Plaintiff



Kandance Wells